



United States Department of Justice

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July 31, 2017

Hon. Mae A. D'Agostino
U.S. District Judge
James T. Foley U.S. Courthouse
445 Broadway, Room 407
Albany, NY 12207

Re: United States v. Abdelmaji K. Lababneh, 1:14-CR-00189 (MAD)

Your Honor:

I write to request a 30-day extension of the deadline for the government to respond to defendant Abdelmaji K. Lababneh's July 5, 2017 motion to vacate sentence pursuant to 28 U.S.C. § 2255 (Dkt. No. 55). The current deadline for the government's response is tomorrow, August 1, 2017.

On July 14, 2017, the Court granted the government's request for an order finding that the attorney-client privilege has been waived as to communications between the defendant and his attorney that are relevant to the claims the defendant makes in his motion. Due to scheduling conflicts, it was not until today, July 31, 2017, that I was able to meet for the first time with the defendant's attorney to obtain such information. I request the 30-day extension so that defense counsel and I may have sufficient time to prepare an affidavit addressing the allegations in the defendant's motion, and so that I may have sufficient time to prepare my response to the many arguments set forth in the defendant's motion. This is my first request for an extension.

Thank you for your consideration.

Very truly yours,

GRANT C. JAQUITH
Acting United States Attorney

By: /s/ Jeffrey C. Coffman
Jeffrey C. Coffman
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Letter to Hon. Mae A. D'Agostino
U.S. v. Lababneh
1:14-CR-00189 (MAD)
July 17, 2017
Page 2

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